

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CHILD TRENDS, INCORPORATED et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
EDUCATION et al.,

Defendants.

Case No. 8:25-cv-01154-BAH

JOINT MOTION FOR BRIEFING SCHEDULE

The parties respectfully request that the Court enter the following briefing schedule on Plaintiffs' forthcoming motion for a preliminary injunction: (i) Plaintiffs file their motion by April 15, 2025, (ii) Defendants file their opposition by April 22, 2025, and (iii) Plaintiffs file their reply by April 27, 2025. The parties further request that the Court hold a hearing on Plaintiffs' forthcoming motion at the Court's earliest convenience. In support of this motion, the parties state as follows:

1. Plaintiffs filed their complaint in this matter on April 7, 2025. Plaintiffs challenge the government's alleged failure to comply with legal requirements to operate the Department of Education's Regional Educational Laboratories (REL) and Comprehensive Center program. Plaintiffs seek, among other things, an injunction to immediately restore the programs.

2. The parties have met and conferred on a proposed briefing schedule on Plaintiffs' forthcoming motion for a preliminary injunction. The parties agree to the briefing schedule set forth above.

3. Accordingly, the Parties jointly request that the Court enter the briefing schedule set forth above and schedule a hearing at its earliest convenience. A proposed order is attached.

April 11, 2025

Respectfully submitted,

/s/Lynn D. Eisenberg

Daniel F. Jacobson+

Lynn D. Eisenberg*

Kyla M. Snow**

admitted pro hac vice

JACOBSON LAWYERS GROUP PLLC

1629 K Street NW, Suite 300

Washington DC, 20006

(301) 823-1148

lynn@jacobsonlawyersgroup.com

* Of Counsel

** Not admitted in the District of Columbia.
Practiced limited to matters before U.S.
courts.

+ pro hac vice motion forthcoming

Counsel for Plaintiffs

KELLY O. HAYES

United States Attorney

District of Maryland

/s/Tianna Bethune

TIANNE BETHUNE

(signed by Lynn D. Eisenberg with
permission of Tianna Bethune)

Assistant United States Attorney

36 S. Charles Street, 4th Fl.

Baltimore, MD 21201

(410) 209-4800

tianne.bethune@usdoj.gov

Counsel for Defendants